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General Information:

With this document, Heck & Becker GmbH & Co. KG commits to promoting the enforcement of principles related to human rights, labor law, environmental protection, and compliance with all applicable legal and other binding obligations across all business activities.

As a globally binding guideline for lawful and ethically responsible conduct within our company, this Code of Conduct defines the standard for our behavior toward employees, business partners, and the public.

Environmental and climate protection are integral components of our corporate responsibility. Heck & Becker has established an integrated management system that systematically addresses quality and environmental aspects. Our objective is to prevent or reduce environmental impacts, use resources efficiently, and continuously improve our environmental performance.

Heck & Becker also expects its suppliers and business partners to comply with the principles of this Code of Conduct. The company commits to ensuring that its suppliers respect these guidelines and that their own codes of conduct reflect the standards established herein.

Heck & Becker's Code of Conduct complies with national laws and regulations and takes internationally recognized standards into account.

Heck & Becker GmbH & Co. KG

- CEO -

Andre Weißbenner

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1. Business Ethics

1.1. Compliance with Labor Rights, Laws, and Regulations

For our company, it is of utmost importance that all our business activities are characterized by social responsibility toward our employees and society as a whole. We respect the personal rights of our employees, offer them good and safe working conditions, and provide a stable environment in which they can develop their talents. It is our goal to adhere to the principles of the UN Global Compact (Davos, 01/99) and the principles and rights adopted by the International Labour Organization (ILO) in the "Declaration on Fundamental Principles and Rights at Work" (Geneva, 06/98).

1.2. Ethical Recruitment

We rely on respect, fairness, and equal opportunities. Transparent processes, honest communication, and confidentiality are essential to us. We promote diversity and make decisions based on qualifications. Our goal is ethical and responsible recruitment.

1.3. Women's Rights

We actively promote and protect women's rights. Discrimination, harassment, and violence against women are unacceptable. We strive for equal opportunities, equality, and a safe working environment for all women. Our goal is to bring about positive change and promote women in all areas.

1.4. Diversity, Equity, and Inclusion

We are committed to promoting diversity, equity, and inclusion. Discrimination based on gender, race, religion, sexual orientation, age, or other characteristics is not acceptable. We create an open and inclusive work environment where everyone is respected and valued. Our decisions are based solely on performance and abilities. Together, we work to foster a culture of diversity and respect.

1.5. Rights of Minorities and Indigenous Peoples

We advocate for the respect and protection of the rights of minorities and indigenous peoples. Discrimination, exclusion, and oppression based on ethnic origin or cultural background will not be tolerated. We respect cultural diversity and promote an inclusive and fair working environment for all. We work to amplify the voices and needs of minorities and indigenous peoples and to safeguard their rights.

1.6. Human Rights, Health, and Environment

We respect the dignity and personal rights of our employees as well as all individuals with whom we maintain business relationships. The observance and support of internationally recognized human rights are fundamental principles of our corporate responsibility.

The protection of human health and the environment is an integral part of our business activities. Heck & Becker commits to complying with all applicable environmental laws, regulations, and other binding environmental obligations.

We pursue the objective of systematically identifying, evaluating, and – where feasible – avoiding or minimizing environmental impacts resulting from our activities, products, and services. This includes, in particular, the responsible use of energy, water, and raw materials, the reduction of waste and emissions, and the safe handling of environmentally relevant substances.

The continuous improvement of environmental performance is a core objective of our environmental management system. Our environmental policy and environmental management handbook define the principles by which we manage and further develop our environmental impacts.

1.7. Rejection of Forced and Child Labor, Human Trafficking

We reject any form of forced and child labor. Participation in human trafficking, the use of violence, and involuntary labor are not tolerated. The principle of freely chosen employment must be accepted. Child labor as defined by ILO conventions and the exploitation of children or support for child labor will not be tolerated.

1.8. Non-Discrimination and Equal Opportunity

Discrimination against employees based on skin color, ethnic or social origin, gender, age, nationality, marital status, disability, political inclination, sexual orientation, or religious affiliation or worldview is not tolerated.

1.9. Anti-Corruption

The company, in particular its executive bodies and employees, undertake not to commit any acts that could lead to criminal liability for a property offense, in particular fraud or embezzlement, theft or embezzlement, insolvency offenses, offenses against competition, the granting or acceptance of advantages, bribery, corruptibility or comparable offenses.

Compliance with the company's anti-corruption policy is essential to ensure the trust of customers, business partners and employees. Heck & Becker GmbH & Co. KG is committed to promoting a culture of integrity and transparency.

1.10. Compensation, Working Hours, and Social Benefits

We commit ourselves and our suppliers to ensure that compensation and social benefits comply with legal requirements concerning minimum wages, overtime, and legally prescribed social benefits. Legal requirements regarding working hours and vacation must be observed. Where national laws on working hours do not exist, the labor and social standards of the International Labour Organization (ILO) apply.

1.11. Occupational Safety, Fire Protection, and Health Protection

With regard to occupational safety, fire protection, and health protection, compliance with national laws and regulations must be ensured in order to provide a safe, ergonomic, healthy, and hygienic working environment.

In addition, we take environmental risks into account in our activities in order to identify potential hazards to people and the environment at an early stage and to implement appropriate protective measures.

1.12. Training and Education

Knowledge and skills represent opportunities in modern society. The company recognizes the importance of employee qualifications as a value for the organization and views its commitment to vocational training and education as an investment in the future.

Through targeted information and training measures, we also promote employee awareness of environmental requirements, environmentally responsible behavior, and their respective roles within the company's environmental management system.

1.13. Freedom of Association and Collective Bargaining

We respect the rights of employees to free expression, freedom of association, membership in trade unions, the formation of employee representatives, and membership in works councils. We also expect our suppliers to ensure compliance with the applicable national laws and regulations in the countries where employees are deployed. Employees and their representatives must be able to communicate with company management without fear of reprisals, intimidation, or harassment.

1.14. Open Dialogue

Open dialogue on concerns significantly contributes to reducing misconduct or recognizing and correcting it at an early stage. Therefore, we value an open climate where employees can confidently and trustingly address critical matters with their supervisors or management.

1.15. Whistleblowing and Protection Against Retaliation

In cases of unethical behavior or violations of national laws or the guidelines of the UN Global Compact (Davos, 01/99) and the principles and rights adopted by the International Labour Organization (ILO) in the "Declaration on Fundamental Principles and Rights at Work" (Geneva, 06/98), it must be possible to seek advice and assistance and report concerns or suspected violations through defined communication channels without fear of retaliation. The procedure for reporting violations is explained below in the "Decision-Making Guide" section.

1.16. Conflict of Interest/Sponsorship Activities

In everyday business, we may face decision-making situations where the company's interests conflict with our personal interests. Conflicts of interest can result in decisions not being made impartially in the company's best interest. Employees affected by a possible or actual conflict of interest are required to inform their supervisor or management promptly to facilitate a swift resolution. We use our sponsorship activities to promote specific goals, such as cultural activities, educational purposes, scientific research, and sports events. We make voluntary donations without expecting anything in return and comply with the applicable laws and regulations. Donations to political parties, political candidates, officeholders, or civil servants are categorically excluded.

1.17. Land, Forest, and Water Rights and Forced Evictions

We advocate for the protection of land, forest, and water rights and condemn any form of forced eviction. We recognize the rights of indigenous peoples and communities to use and protect their land, forests, and water resources. We act in accordance with internationally recognized standards and laws to respect community rights and obtain their consent. Our responsibility is to use natural resources sustainably and uphold human rights.

1.18. Use of Private or Public Security Forces

We are committed to the responsible and ethical use of private or public security forces. We ensure that their deployments are consistent with human rights, applicable laws, and international standards. We carefully review the backgrounds and competencies of security forces and ensure appropriate training and supervision. We promote the protection of individual freedoms, respect for privacy, and respectful interaction with all involved.

1.19. Environmental Responsibility of Employees

All employees of Heck & Becker are required, within the scope of their activities, to comply with applicable environmental requirements and internal environmental regulations.

Environmentally relevant deviations, incidents, risks, or improvement opportunities must be reported at an early stage. Every employee contributes through responsible behavior to preventing environmental impacts and to continuously improving the company's environmental performance.

Managers have a special role-model function and actively support the implementation of environmental objectives.

2. Compliance

2.1. Relationships with Business Partners

Our business partners (e.g., customers, suppliers, agents, and consultants) expect that they can rely on Heck & Becker as a law-abiding business partner. This also requires that we are familiar with and comply with our contractual obligations.

We expect our business partners to comply with applicable legal requirements, particularly in the areas of environmental protection and occupational safety, and to use natural resources responsibly. Environmental aspects may be taken into account in the selection and evaluation of business partners.

2.2. Interaction with Political Institutions and Authorities

In dealing with governments and authorities, we always act honestly and transparently and in accordance with applicable laws. This applies, for example, to contacts with authorities in everyday business (for necessary licenses, permits, or contract negotiations), political lobbying, or government inquiries (requests for information, official investigations, legal proceedings).

2.3. Protection Against Corruption and Bribery

At Heck + Becker GmbH & Co. KG, any form of bribery and corruptibility is prohibited. Inducements, for example in the context of invitations or in connection with advertising measures that serve the purpose of promoting business relationships or presenting products or services, are permitted - provided they are moderate. In all cases, compliance with the relevant statutory provisions must be ensured. The company's anti-corruption guidelines apply. However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage.

2.4. Fair Competition

We adhere to the global understanding of the prohibition of relationships and agreements with competitors, suppliers, distribution companies, and traders that harm fair competition. We are committed to fair competition and comply with its laws and rules in all countries.

2.5. Product Safety

We see ourselves as partners to our customers. Long-term customer relationships are essential to our business success.

Our objective is therefore to deliver safe, flawless, and high-quality products and services while also considering relevant environmental aspects within the scope of our possibilities.

2.6. Disclosure of Information

Information regarding business activities, structure, financial situation, and performance of the company will be disclosed in accordance with relevant regulations. By providing factual information and communication, trust is built with the public, employees, and business partners.

2.7. Export Controls and Economic Sanctions

We check for export controls and economic sanctions and provide the appropriate evidence, certificates, or declarations.

2.8. Protection of Intellectual Property and Plagiarism

The protection of intellectual property is of essential business importance to us. Therefore, regardless of commercial value, we aim to prevent the violation of any author's exclusive rights to their protected works. This also applies to the products of their intellectual work. Technology and know-how transfers must be conducted in such a way that intellectual property rights are protected.

It must be ensured that neither we nor our partners use plagiarism or create conflicts of interest. Furthermore, we expect our partners to comply with the respective commercial regulations and laws on import and export controls in all countries where they operate.

2.9. Money Laundering

The relevant legal provisions for the prevention of money laundering must be adhered to.

2.10. Data Protection

When collecting, storing, processing, or transmitting personal data (e.g., name, address, phone number, date of birth, health information) of employees, customers, or other third parties, we ensure the utmost care and strict confidentiality.

2.11. Information about Products and Services

We always provide truthful information regarding our products and services. This also applies to environmental statements and environmental-related information.

False or misleading information may harm both our customers and our reputation. Such conduct contradicts our principles and is not permitted.

2.12. Use and Security of IT Systems

In daily business, IT systems are regularly used, and data is processed. Suitable security measures (passwords, authorized technologies, and licensed software) are required to ensure the protection of intellectual property and personal data. Neglecting necessary security measures can have serious consequences, such as data loss, theft of personal data, or copyright violations. Since digital information spreads quickly and can be easily copied, we handle the content of emails, attachments, downloaded files, and saved voice messages with the necessary care.

Heck & Becker GmbH & Co. KG has established an Information Security Management System (ISMS) according to VDA5.1.

2.13. Confidentiality and Public Relations

Confidential information is only intended for the designated recipients and is not to be disseminated internally or externally. Discussing confidential information in public or unauthorized disclosure of information about the company or its customers to third parties constitutes a breach of confidentiality.

3. Decision-Making Guide

If you are ever unsure whether a decision aligns with the requirements of the Code of Conduct, review it based on the following questions:

- Is my decision legal, and does it comply with the company's rules?
- Can I make the decision in the best interest of the company and free from competing personal interests?
- Can I reconcile the decision with my own conscience?
- Can I disclose the decision publicly without issue? Would it withstand scrutiny by third parties?
- Does my decision preserve the company's good reputation?

If you can answer "Yes" to each of these questions, your decision is likely justifiable. If you have doubts about any of these questions, seek qualified advice.

You can contact individuals in your immediate work environment to ask questions about the Code of Conduct or report violations of the Code. These include, for example:

Supervisor, HR department, Works Council

If you do not want to address your concerns locally or if you do not find adequate support there, you can report the violation on an external whistleblowing portal. The related link can be found on our website or at

<https://whistleblowersoftware.com/secure/heckbecker>

The next page contains valuable information about the channel.

4. Heck & Becker GmbH & Co. KG Whistleblower Channel

Both employees and external individuals and organizations can report violations, which may be subject to criminal or administrative penalties, anonymously through this channel.

- The organization "Whistleblower-Software" is impartial, independent, and free from instructions.
- The company ensures that whistleblowers are protected from any form of disadvantage, discrimination, harassment, or retaliation.

4.1. Anonymous Reporting of Serious Matters

You can submit information regarding justified suspicions, knowledge of actual or possible violations, or attempts to conceal such violations that have already been committed or are highly likely to occur. Additionally, you can report unethical behavior or behavior that violates internal policies.

Reports are made 100% anonymously. All reports are treated confidentially and with the utmost protection. All inquiries are handled confidentially and securely.

4.2. Personnel Matters

Personnel matters cannot be reported through this system. These should be discussed with the works council, direct supervisor, CEO, or HR department.

On this page, you can create a new secure report or follow up on an existing report.

4.3. Complaint Procedure Rules

The complaint will be examined promptly and thoroughly. The responsible entity will take appropriate measures to investigate the incident.

4.4. Follow-up on Reports

- You can view the status of your report to check if measures are being taken.
- You can add additional information to your report.
- The system administrator has requested additional information from you, which is necessary to resolve the issue or take appropriate measures.